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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

U.S. DISTRICT COURT EASTERN DISTRICT OF MC ST. LOUIS

UNITED STATES OF AMERICA,	
Plaintiff,	)
v.	1.16CD00120 CET
JONATHAN E. POHLMANN,	4:16CR00129 CEJ
Defendant.	) )

#### **INFORMATION**

#### General Allegations

The United States Attorney charges that:

- 1. At all times relevant to this Information, the Gasconade County Sheriff's Office, the Hermann Police Department, and the Rosebud Police Department were law enforcement agencies in the Eastern District of Missouri. Among other functions, these law enforcement agencies investigated crimes committed in Gasconade County, Missouri.
- 2. At all times relevant to this Information, employees of these law enforcement agencies were responsible for conducting themselves in compliance with federal, state and local laws, including the United States Constitution.
- 3. At all times relevant to this Information, MARTY L. RAINEY was triple-commissioned and employed by the Gasconade County Sheriff's Office, the Hermann Police Department, and the Rosebud Police Department as a law enforcement officer.
- 4. At all times relevant to this Information, defendant JONATHAN E. POHLMAN was a friend and associate of defendant MARTY L. RAINEY.

5. At all times relevant to this Information, T.M., M.G., and S.S. were women who came into contact with defendant JONATHAN E. POHLMAN through their contact with MARTY L. RAINEY in his capacity as a law enforcement officer.

# COUNT ONE (Conspiracy Against Rights)

The United States Attorney further charges that:

- 1. Paragraphs 1-5 of the General Allegations are incorporated by reference in this Count.
- 2. Between, on or about January 1, 2012, and April 30, 2013, within the Eastern District of Missouri, and elsewhere, defendant

### JONATHAN E. POHLMANN,

while acting under color of law, willfully combined, conspired, and agreed with MARTY L. RAINEY, to injure, oppress, threaten, and intimidate T.M., M.G., and S.S., with whom MARTY L. RAINEY initially came into contact as a law enforcement officer, in the enjoyment of rights and privileges secured to them by the Constitution of the United States, not to be deprived of liberty without due process of law, which includes the right to bodily integrity. Specifically, the defendant engaged in acts that resulted in bodily injury.

All in violation of Title 18, United States Code, Section 241.

Respectfully submitted,

RICHARD G. CALLAHAN

United States Attorney

JENNIFER WINFIELD, 53350MO

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UNITED STATES OF AMERICA	)
EASTERN DIVISION	)
EASTERN DISTRICT OF MISSOURI	)

I, Jennifer A. Winfield, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

JULIGU ULUĞU OF JEDNIFER A. WINFIELD, 58350MO

Subscribed and sworn to before me this  $\mathcal{A}_{\mathcal{A}}$ 

day of March 2016.

CLERK, U.S. DISTRICT COURT

Bv:

DEPUTY CLERK